

REMARKS:

In response to the Office Action mailed on January 25, 2005, Applicant respectfully submits the following remarks. Claims 1-45 are pending in the application and are currently under rejection.

Claim Rejections 35 USC §103

The Examiner has rejected Claims 1, 3-7, 9-11, 13, 16, 17, 20, 22-27, 29-33, 35, 37, 38, and 43-44 under 35 U.S.C. 103(a) as being unpatentable over US Publication No. 20030225876 to Oliver et al. in view of Wolton et al. US Publication No. 20040030741. Claims 2, 12, 15, 21, 28, 36 and 39-42 are rejected under 35 U.S.C. 103(a) as being unpatentable over Oliver et al. in view of Wolton et al., as applied to claims 1, 11, 20, 27, 35, and 38 above, and further in view of Shimada et al. (U.S. Patent No. 6,757,580). Claims 8, 14, 34 and 45 are rejected under 35 U.S.C. 103(a) as being unpatentable over Oliver et al. in view of Wolton et al., as applied to claims 1, 11, 27 and 38 above, and further in view of Duffy et al. (U.S. Publication No. 20020171985). Claim 18 is rejected under 35 U.S.C. 103(a) as being unpatentable over Oliver et al. in view of Wolton et al. and Shimada et al. Claim 19 is rejected under 35 U.S.C. 103(a) as being unpatentable over Oliver et al. in view of Wolton et al. and Shimada et al., as applied to claim 18 above, and further in view of Duffy et al. Applicant respectfully traverses these rejections of the claims.

Other than the method and system disclosed in the present application, Applicant is unaware of any reference in which the following has been proposed: a color-coded physical machine data read from hardware that may be displayed as a D-D model that may be manipulated and that represents the view of the physical world with physical operational data, such as temperature, voltage, power consumption, airflow, etc., layered on top of the physical data.

The claims as filed recite elements that claim this improvement in the art. The claims recite in various forms:

- "a communication circuit that receives data representing the measured parameters from the plurality of pieces of equipment"
- a method or system for "monitoring measured parameters associated with each piece of equipment in an array of electronic equipment."
- "retrieving data representing the measured parameters from a database"
- "mapping the measured parameters to color codes"
- "displaying a graphic representation of the array of electronic equipment"
- "representing each piece of electronic equipment in the array with the color mapped to a measured parameter associated with the piece of electronic equipment."

(emphasis added)

A fair reading of the claims and the patent specification make it clear that the measured parameter data refers to data obtained from measurement of actual, physical parameters, such as voltage, current, temperature, power, one would measure from pieces of equipment. Raw hardware system data is being gathered and is made readable externally to the hardware, where it is processed and, presented in a much more detailed, user-controllable, three-dimensional (3D) view. The data is not gathered by talking to the operating system, but rather by communicating with the intelligent hardware itself. The Examiner is respectfully referred to the specification where this is clearly taught, including page one, lines 14-25; and page three, lines 7-28, in which measurable parameters of electrical/electronic equipment are discussed.

None of the references, whether considered in combination or singly, teach, suggest, disclose or render obvious these, as well as other, recitations of the claims. Oliver and Wolton refer to displaying virtual data in a virtual representation that bears no resemblance to real world data (i.e. data representing measured parameters) and is certainly not data that would be displayed as a graphic

representation of pieces of electronic equipment. Color-coding in Oliver and Wolton is both based on virtual processed data, not physical characteristics. It is important to note that even when these references use the term "physical" they refer to network link connectivity, not physical, measurable, attributes or parameters such as power, temperature, air movement, etc.

Moreover, none of the cited references have proposed using measured parameter data collected from electronic equipment as a means for understanding the "health" of a piece of equipment, collection of equipment, or the data center or room in which such equipment resides. Additionally, none of the cited references teach displaying this measured parameter data in a tabular, let alone visual, manner, or drawing conclusions based upon processing of this type of data.

In particular, with regard to independent claims 1, 10, 11, 17, 18, 20, 27, 35, and 38, consider the following. The Oliver reference refers to reading a network performance data readily available in tabular format and presenting a simplistic format for displaying it to a user. Oliver does not mention data other than network performance data, which has already been manipulated and processed before being read. Importantly, the data to which Oliver refers is virtual performance data, not measured parameter data, which does not have a one-to-one correspondence with physical hardware (i.e. electronic equipment or electrical devices). Oliver simply describes a simply two-dimensional display-little different from a map. This type of data has been available on systems for many years and is read from the operating system, not measured from physical equipment parameters.

Another recitation of some of the claims is the selection of only the relevant data from the database based upon the unique 3D view the user has, and then mapping that data to that 3D view. It is noted that none of the referenced art mention, teach, suggest or disclose this functionality. Section 0028 of Oliver refers to selecting which network parameter to display. Section 0029 of Oliver discloses drilling down on data by clicking on it, something that has been common in the data display art for many years.

Wolton likewise performs similar functions. Once again, Wolton is focused on virtual networks, not physical entities and their measurable parameters. It draws pictures of non-existent things rather than drawing 3D drawings representative of a physical data center and physical attributes of actual machines. Again, both Wolton and Oliver are drawing imaginary pictures based upon an imaginary view, not a 3D model of a real world environment that may be manipulated.

With regard to claims 3-7, 9, 13, 16, 22-26, 29-33, and 37, Applicant first notes that these claims depend from independent claims that have been shown to be patentably distinct over the cited references. Moreover, it is important to acknowledge that the change of views described in Oliver more accurately represents a selection of a subset of a superset of data. It does not change the human view perspective as it is necessarily directed to a discussion of virtual data. Wolton discusses displaying virtual data that presents a false sense of 3D, as it is a map of virtual data and thus not a true view. The manipulation of the 3D view described in the specification is akin to what a person would actually see.

A note about the Shimada and Duffy references is in order here. Both of these references are used in combination with the Wolton and Oliver references and fail to cure their defects, which have been discussed at length above. But, again, Shimada is also not directed to physical, measurable parameter data, of the kind recited in the claimed invention. Furthermore, it is noted that Duffy has no discussion whatsoever about reporting and displaying physical, measured parameter data.

For the foregoing reasons, Applicant respectfully submits that the current claims are not obvious in light of the cited references. Because the combination of the references does not teach, suggest, disclose or render obvious every element of the claims, the rejections of the claims are unsupported by the art and should be withdrawn. Reconsideration and allowance of the claims is hereby requested at the Examiner's earliest convenience. Please contact the undersigned if there are any questions regarding this response or application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Renee' Michelle Leveque', written over a horizontal line.

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